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November 5, 2024

Via ECF

Hon. Lewis J. Liman  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Freeman et al. v. Giuliani*, 24-mc-00353-LJL

Dear Judge Liman:

We represent Defendant, Rudolph W. Giuliani (“Defendant”).

This letter is submitted in response to the Court’s Memo Endorsement requiring that “Defendant Giuliani shall respond to the information subpoena by 5:00 p.m. on November 5, 2024, on pain of sanctions” and that he “shall file proof of compliance on ECF by that date.” ECF 77.

Today, we served a response to the information subpoena on counsel for Plaintiffs via email. As ordered, a copy of the email indicating proof of compliance is attached.

Respectfully submitted,

/s/ Kenneth A. Caruso  
Kenneth A. Caruso

cc: Counsel of Record (via ECF)